

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PROJECT VERITAS ACTION FUND,)
Plaintiff,)
v.) C.A. No. 1:16-cv-10462-PBS
DANIEL F. CONLEY, in his official)
capacity as Suffolk County District)
Attorney,)
Defendant.)

MOTION TO IMPOUND SELECT CONFIDENTIAL DISCOVERY MATERIAL

Pursuant to Local Rule 7.2, Plaintiff seeks leave of the Court to impound certain Confidential Discovery Material that Defendant notified it would use in its forthcoming dispositive filings. Specifically:

- a. Material Related to Ongoing Litigation in *Wentz v. Project Veritas*, United States District Court, Middle District of Florida, 6:17-cv-01164-ORL-18GJK:
 - i. Deposition of Robert Joel Halderman, 242:17-243:19; 254-255; 256:13-16; 257:1-13.
 - ii. Submitted video file “Wentz/Teachers Union Prez” - “confidential - FNOE0239_20150628192900.mp4”
- b. Material Related to Undercover Journalists Names or Confidential Information Concerning Veritas’ Operations:
 - i. Redaction in Deposition of Russell Joseph Verney 75:12-18.
 - ii. Redaction in Deposition of Robert Joel Halderman 95:1-17.

6/12/18 Plaintiff shall submit r
the material is under seal
court rec'd.